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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

PETER VELASCO, *et al.*,

Plaintiffs,

v.

CHRYSLER GROUP LLC,

Defendant.

Case No. 2:13-cv -08080-DDP (VBKx)

**[PROPOSED] FINAL ORDER AND
JUDGMENT**

1 Plaintiffs' Motion for Final Approval of Class Settlement and Motion for
2 Attorney Fees, Costs, and Service Awards came before the Court for hearing on
3 January 11, 2016, pursuant to the Amended Order Granting Preliminary Approval of
4 Class Settlement dated August 31, 2015 ("Preliminary Approval Order"). Having
5 considered the parties' Class Action Settlement Agreement ("Settlement"), and all
6 papers filed and proceedings had herein, IT IS HEREBY ORDERED, ADJUDGED
7 AND DECREED:

8 1. Capitalized terms not otherwise defined herein shall have the same
9 meaning as set forth in the Settlement.

10 2. All preliminary findings and conclusions in the Court's Preliminary
11 Approval Order are hereby made final. In particular, the Court affirms its findings that
12 the following settlement class meets the requirements of Rule 23(b)(3) of the Federal
13 Rules of Civil Procedure:

14 All persons who purchased or leased a model-year 2011, 2012, and/or 2013
15 Dodge Durango or Jeep Grand Cherokee vehicle in the United States.

16 Excluded from the Class are FCA US and all of its affiliates, parents,
17 subsidiaries, successors, and assigns; the officers, directors, and employees of
18 FCA US; all entities which purchased a vehicle solely for purposes of resale; and
19 any judge to whom this case is assigned.

20 3. The Court finds that notice has been disseminated to the Class in
21 compliance with the Court's Preliminary Approval Order and that the notice given was
22 the best notice practicable under the circumstances, fully satisfied due process, and met
23 the requirements of Rule 23 of the Federal Rules of Civil Procedure. The Court further
24 finds that notice provisions of 28 U.S.C. § 1715 were complied with in this case.

25 4. The Court finds that the Settlement is fair, reasonable, is in the best
26 interests of the Class, has been entered into in good faith, and should be and hereby is
27 fully and finally approved pursuant to Federal Rule of Civil Procedure 23.
28

1 5. The Court finds the attorney fees and costs requested by Class Counsel are
2 fair and reasonable, given Class Counsel's lodestar of \$2,843,856, the results achieved
3 through this litigation, and the contingent nature of the fee. The Court has reviewed
4 the records submitted by Class Counsel and finds reasonably spent over 6,000 hours
5 representing the class's interests through this litigation, that Class Counsel's hourly
6 rates are reasonable and in line with the prevailing rates in the community for complex
7 class action litigation, and that the costs incurred to prosecute the litigation were
8 reasonable. Accordingly, Class Counsel is hereby awarded attorney fees in the amount
9 of \$3,526,000, and costs in the amount of \$109,735, both amounts to be paid by
10 Defendant pursuant to the terms of the Settlement.

11 6. The Court further finds the requested service awards are fair and
12 reasonable, given the time and effort expended by the Class Representatives on behalf
13 of the Class. Class Representatives are hereby awarded \$4,000 each, to be paid by
14 Defendant pursuant to the terms of the Settlement.

15 7. The Release set forth in the Settlement, in Section IV, is incorporated
16 herein and, as of the Effective Date, is binding and effective on all Class Members who
17 have not properly excluded themselves from the Class.

18 8. Attached to this Final Order and Judgment is a list setting forth the name
19 of each person who properly excluded themselves from the Class in compliance with
20 the procedures set forth in the Preliminary Approval Order. The persons so identified
21 shall be neither entitled to benefits from the Settlement nor bound by this Final Order
22 and Judgment.

23 9. There being no just reason for delay, the Court, in the interests of justice,
24 expressly directs the Clerk of the Court to enter this Final Order and Judgment, and
25 hereby decrees that, upon entry, it be deemed a final judgment. Without affecting the
26 finality of this Judgment in any way, this Court hereby retains continuing jurisdiction
27 over (a) implementation of the Settlement; (b) further proceedings, if necessary, on
28 applications for attorneys' fees, expenses, and costs in connection with the action and

1 the settlement; and (c) the Parties and the Class Members for the purpose of
2 construing, enforcing, and administering the Settlement Agreement and all orders and
3 judgments entered in connection therewith.

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5 Dated: _____
6 DEAN D. PREGERSON
7 United States District Court Judge
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